

FIL034958-15

US EPA RECORDS CENTER REGION 5



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REYNOLDS ALUMINUM

Reynolds Metals Company • PO Box 27003 • Richmond, Virginia 23261

September 28, 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kevin W. Lyons
Ecology & Environment, Inc.
111 West Jackson Boulevard
Chicago, Illinois 60604

RE: Comments on Site Inspection Report
Illinois/F05-8612-032/FIL0349SI

Dear Mr. Lyons:

Please find attached our comments on the site inspection conducted at the quarry site located in McCook, Illinois. We are very concerned about the inaccuracies included in this site inspection report and how those inaccuracies will, we believe, lead to improper and erroneous conclusions concerning the quarry site.

Our detailed comments, which are attached, focuses on two major areas of concern. These areas of concern are:

1. Improper site identification, and
2. Unsubstantiated conclusions concerning the potential for groundwater and surface water contamination.

Reynolds is, of course, willing to meet with you or any appropriate members of your organization, or any appropriate officials from the State of Illinois, or the U. S. Environmental Protection Agency to help clarify these or any remaining issues or questions you may have.

Please feel free to contact me at 804/281-2918 if you wish to arrange a meeting or if you have any remaining concerns.

Sincerely,

C. R. Bent, P.E.
Corporate Environmental Control
Department

CRB/lt
Attachment

cc: Ms. Mary A. Gade, Acting Chief
Emergency & Remedial Response Branch
U.S. Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, Illinois 60604

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Part I; Item 01, Site Name

Reynolds Metals Company is only one of several lessees of this site. Reynolds Metals Company has never owned this site. A more proper name for this site is Vulcan Material Corporation Quarry Site in that they have owned the site since September 1942.

Part I; Item 02, Site Status

The old quarry is no longer being used as a landfill. In fact, all disposal activities ceased in 1982; therefore, the site status should indicate that the site is "inactive".

Part I; Item 03, Years of Operation

As all landfiling activity ceased in 1982, this item should include 1982 as the "ending year".

Part 2; Item 02, Waste Quantity at Site

Reynolds questions the accuracy and source of the alleged 9,360 drums. It was not the practice of Reynolds to dispose of drums in the landfill. This information should be substantiated or removed. *corrected by [unclear]*

Part 2; Item 03, Waste Characteristics

The EP Toxicity data provided in Item IV, Hazardous Substances, does not substantiate a rating of "Toxic". In addition, a waste characteristic of "Persistent" does not appear justified based on the alleged materials placed in the landfill. These items should be removed.

Part 3; Item II, Hazardous Conditions & Incidents

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The data included in this entire item indicates that no harm has been done to human health or the environment. However, the report incorrectly concludes, we believe, that there is a potential for groundwater and surface water contamination, fire potential and unstable containment of wastes.

The report states that "no contamination of groundwater has been documented" and that "no contamination of surface water has been documented". Furthermore, the landfill fire in 1978 was a one time event which resulted in minor amounts of smoke over an extended period of time. The alleged spillage of material on the haul roads, if it ever occurred, is typical of any landfill operation and certainly shouldn't be an item of major environmental concern.

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Reynolds believes that the factual information presented does not substantiate the report's conclusions. Therefore, we believe that the conclusions in this Part should clearly reflect the factual information presented.

Part 4; Item II, Permit Information

We completely fail to see the relationship between the quarry site, which as previously noted is owned by Vulcan Material Corporation and permit numbers at our McCook Plant. Reynolds Metals Company has no knowledge of any permits issued to Reynolds for the operation of the quarry. Whether Vulcan Material Corporation has had any permits issued for its property would best be verified through Vulcan's management.

Permit numbers or identification numbers including all references to the Reynolds' McCook manufacturing operation should be removed from this inspection report.

Part 4; Item 07, Comments

As previously noted, the legal owner of this site is Vulcan Material Corporation and, as such, is a more accurate site name. It should also be noted in the report that the U. S. Government, under the Defense Plant Corporation and the Reconstruction Finance Corporation, conducted the operation of the entire manufacturing facility including the landfill throughout the 1940's. During World War II, the plant and landfill was operated by a major American aluminum company other than Reynolds. Ecology & Environment, Inc., should attempt to obtain factual information for all previous owners and operators of this site. The report should also note the Vulcan Material Corporation, or its parent company(s), has owned the landfill since September 1942.

Part 5; Item III, Groundwater

The report should include data on the extensive quarry operations to the north and west of the inspected site. The Material Service Corporation (MSC) quarry shares a common wall with the southwest face of the RMC quarry. The elevation of the bottom of the McCook quarry is at 540' above mean sea level (MSL). The majority of the quarry floor at MSC is at 409' MSL, with proposed final grade at approximately 355'.

Seepage/groundwater is pumped at up to 2,000 gpm during constant dewatering operations at MSC. This discharge is directed to the Summit-Lyons Creek. Both quarries are located entirely in the Silurian dolomite which is heavily jointed. A system of open vertical joints trending northeast-southwest may

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be seen in the MSC quarry. This local joint pattern indicates a probable hydraulic connection between the McCook and MSC quarries. Coupled with the significant difference in the quarry floor elevations, it appears that the McCook quarry should be discharging groundwater to the MSC quarry. Certainly the 2,000-gpm dewatering operation is providing a major control on regional groundwater flow directions. However, extensive sampling efforts by the IEPA have failed to show any groundwater contamination resulting from the landfill operation. Analytical data should be obtained from the IEPA for inclusion in this report.

Part 8; Item III, Previous Operator(s)

The Defense Plant Corporation and the Reconstruction Finance Corporation leased and operated the site from July 1942 until June 1949. Both of these corporations were instruments of the U. S. Government as part of our war effort.

Prior to September 1942, Mr. & Mrs. Thomason owned the quarry (landfill). Ownership was transferred to the Consumers Company in September 1942. Consumers Company is a parent company of Vulcan Material Corporation having merged into Union Chemical and Materials Corporation during the 1960's or 1970's. As such Vulcan Material Corporation, etc. al., has owned the landfill since 1942. This information should be included in the report.

Part 9; Item II, On-site Generator

The landfill was first used by the U.S. Government during World War II. It is our understanding that throughout the war effort the McCook Plant's wastes were deposited in the landfill.